

# LATHROP & GAGE<sup>LLP</sup>

JAMES F. THOMPSON  
DIRECT LINE: 816.460.5815  
EMAIL: JTHOMPSON@LATHROPGAGE.COM  
WWW.LATHROPGAGE.COM

2345 GRAND BOULEVARD, SUITE 2200  
KANSAS CITY, MISSOURI 64108-2618  
PHONE: 816.292.2000  
FAX: 816.292.2001



June 23, 2011

## VIA FEDEX

Mr. Thomas Martin  
Associates Regional Counsel  
United States Environmental Protection Agency  
Region 5, C-14J  
Office of Regional Counsel  
77 W. Jackson Boulevard  
Chicago, Illinois 60604-3590

Re: Former Rogers Cartage Facility, Cargill Road, Cahokia, Illinois

Dear Tom:

I am writing as a follow-up to our recent telephone conversation and in response to EPA's May 27 request for past cost reimbursement addressed to Rogers Cartage Company, TankStar, Inc. and ConocoPhillips Pipe Line Company ("CPPL"). As we have discussed, Rogers Cartage has not been responsive despite our repeated efforts over the past several years to get the company to accept responsibility for the PCB contamination it caused.

Enclosed for your information is a copy of a letter we sent to Rogers Cartage's counsel last week. We have received no response. As I mentioned in our recent call, CPPL has now filed a lawsuit against Rogers Cartage and intends to pursue the matter aggressively.

As the current owner of the property, CPPL is interested in proceeding with further discussions with EPA in hopes of entering into a Consent Decree to address the contamination problem and EPA's claim for past costs as soon as possible. We would also like to discuss how EPA intends to respond to Rogers Cartage's continued recalcitrance.

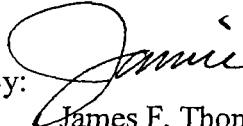
We believe a meeting with EPA and the Department of Justice would be helpful to discuss the path forward and the parameters of a Consent Decree. We would be happy to meet in your offices in Chicago, if that is most convenient for you. Please let me know

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your availability for such a meeting, and I will coordinate with my client to arrange a mutually convenient time

Sincerely,

LATHROP & GAGE LLP

By:   
James F. Thompson

JFT

Enclosure